

## **EXHIBIT "L"**

### **Detailed Analysis of the Cooper Process Referred to in the Examiner's Rejection**

Applicant submits the following descriptive summary of the subject invention's novel process and an analysis and discussion of the Examiner's Cooper process references.

Applicant respectfully submits that Cooper does not describe, teach or suggest, is not similar to, and does not anticipate the novel process and the novel features of the subject invention.

#### DESCRIPTIVE SUMMARY OF THE SUBJECT INVENTION'S NOVEL PROCESS:

1. Sender's one communication to the invention's IVR computer implements the entire cash transfer process.
2. The transfer is processed in automated modes utilizing electronic medium structure elements.
3. The process incorporates a sequence of processes which convert and process data in the "language" of existing banks, processors, processing networks and clearing houses.
4. The process sequence receives cash from the sender's credit card or debit card account and sends cash to the recipient's magnetic stripe card account virtually simultaneously.
5. The cash is transferred by a "split deposit."
6. The process's fee is transferred to the process's income account.
7. The recipient's cash, plus a reserve for a terminal surcharge, is transferred to the recipient's pre-possessed magnetic stripe card with a pre-assigned PIN number.
8. The transfer may be to a national bank escrow account accessible with the invention's Cash Card created for the sole purpose of paying out transfers made to the escrow account for a recipient in possession of a Cash Card.
9. The transfer may be made to a pre-existing credit card or debit card account for a recipient in possession of a magnetic stripe credit card or debit card.
10. The Cash Card is not a one time use card and the PIN number can be changed.
11. The recipient's cash will be accessible from virtually any ATM or POS terminal.

12. The recipient's cash may be accessed in other than the currency of the sender by pay-out in the currency of receipt at the exchange rate at the time of pay-out.
13. The system will process multiple senders' individual calls and transfers simultaneously.

ANALYSIS AND DISCUSSION OF THE EXAMINER'S COOPER REFERENCES:

1. 102, Fig. 1. ASender@ in conventional wire transfers. Demonstrates that all money transfer processes have Asenders,@ but are granted patents if the transfer process is unique.
2. 502, Fig. 5. APool of sender consumers@ in Cooper=s very different process requiring card initiation and delivery of card to recipient.
3. 104, Fig. 1. ARecipient@ in conventional wire transfers demonstrates that all money transfer processes have Arecipients,@ but are granted patents if the transfer process is unique.
4. 504, Fig 5. ARecipient consumers@ in Cooper=s very different process requiring card initiation and delivery of card to recipient.
5. Figs 1, 5, PPS 0059-0062 ASender consumers@ and ARecipient consumers@ (equivalent to our AHuman@ senders and recipients).
6. 0066 Cooper IVR can utilize a 1-800 telephone number or internet for a security system that allows AACTIVATION@ upon verification of the receipt of the ACONFIGURED Computer Readable Medium": the Atransaction control center@ then sends an ACTIVATION signal to the Atransaction database,@ which enables the "CONFIGURED Computer Readable Medium" to be used by a ANETWORK@ of ATMs or other cash dispersion devices.
  1. Same communication system as ours, but totally different process.
7. 812, Fig. 8 [Verifies] valid transaction.
  1. Again, a completely different process providing for the Averification of the transaction@ by the sender and the relaying of information to a location for PICK UP of the card by the recipient who then ACTIVATES the CONFIGURED Computer Readable Medium.
8. 0081 Sender and recipient can be the same person so card can be purchased at a third party vendor location as a gift money card.
  1. Cannot see where this relates to our invention. Examiner cites along with 0082 B probably just a mistake in citing. Actually, it describes a common Agift card@ B not a money transfer system.

9. 0082 Apparently cited by the Examiner with reference to our invention=s processing of a transfer.

Cooper describes a Atransaction control center@:

1. The sender communicates:

A. A AUNIQUE SECURITY IDENTIFIER@

1) This is not needed or utilized in our process, which does not require any AUNIQUE@ information from the recipient to acquire a recipient medium.

a) The subject invention's process provides security by such means as the recipient=s card already being in the possession of the recipient B thereby not requiring any AUNIQUE@ information for the recipient to be able to acquire the card. Our card is already possessed by the recipient prior to the transaction, not acquired after the sender initiates the process.

B. AAn optional PICK UP PASSWORD@:

1) Not needed in our invention's easier process, which does not require pick-up after sender initiation or a password to acquire an ATM card since same is in the possession of the recipient prior to sender initiation of the cash transfer. In addition, a password would require human service and would not be automated.

C. "PICK UP LOCATION CRITERIA":

1) This Cooper method requires this information from the sender relative to the recipient's location to determine the most appropriate location for delivery of the card to the recipient.

a) Not needed in our invention's easier process in which the recipient card is already possessed.

2) "Data received from the transaction server 'includes'":

a) "Delivery [of the card] location appropriateness and availability."

1) Not as good as the older Western Union process which requires the recipient to go to a location to receive cash. In Cooper, the recipient would receive a "CONFIGURED Computer Readable Medium" which then would need to be utilized with a NETWORK ATM.

a) Not needed in our invention's easier process which does not require the recipient to go to any specific location to obtain a card. In our business process, the recipient will already be in possession of the intended magnetic stripe recipient card, thereby requiring only one call from the recipient to the sender without the necessity of communication of any information from the sender to the recipient. The recipient is not limited to pick up at a location. The Cooper system finds the most appropriate of locations AVAILABLE for PICK UP

of their method's, "CONFIGURED Computer Readable Medium." Our process utilizes a card already possessed by the recipient.

- 3) "Data [from] the recipient...includes a verification request via a communications system."
  - a) Not needed in our invention's easier process, which does not require the recipient to communicate with the system for verification or any other purpose.

OBSERVATIONS: The Cooper paragraph, 0082, does describe a system using a "communications system" to effect a transfer of information AS DO ALL I.V.R. PROCESSES PRESENTLY GRANTED PATENTS. However, our process gathers different data and effects a different process and a different result than this Cooper process.

10. 512, Fig. 5 and 712, Fig. 7 Provide for "A COMPUTER READABLE MEDIUM" for the recipient:

1. Our process's recipient card is specifically limited to, and is solely, a magnetic stripe card which is "readable" by a magnetic stripe "reader," already part of existing ATMs and POS devices.
  - A. Our process provides for a secure national bank escrow account for a Cash Card used to pay out cash transfers.
  - B. The drawings describe a "CONFIGURED Computer Readable Medium" being utilized to effect access to an ATM by utilizing (an undescribed) "TRANSACTION FULFILLMENT CENTER."
    - 1) The Cooper "CONFIGURED Computer Readable Medium" does not describe a process that will work with presently existing ATMs. The Cooper medium described would only be able to access a Cooper network ATM which would accept a pay out order from the Cooper invention's (undescribed) "TRANSACTION FULFILLMENT CENTER."
      - a) Our process effects an actual transfer of cash from the sender's account to an account accessible by any common ATM which utilizes common processing networks as, for example, VISA, MasterCard, Cirrus, STAR, or the like, already established processing networks which process magnetic stripe cards.
      - b) Our national bank escrow account into which the sender's transfer is deposited and accessible from an ATM with a magnetic stripe VISA or similar card processing network is very different from the Cooper "CONFIGURED Computer Readable Medium" and "TRANSACTION FULFILLMENT CENTER." Our process receives the cash transfer from the sender's card account and deposits the recipient's portion into a magnetic stripe ATM accessible account.

11. Fig 5, 7 "A computer readable medium":
1. See 10. Above.
  2. See 12. Below.
12. 0068 Describes a very different process than the aspect of our process cited by the Examiner, that is, our process utilizing a PIN and the recipient's magnetic stripe credit, debit or Cash Card.
1. Describes withdrawing consumer entering the "UNIQUE SECURITY IDENTIFIER" communicated to him by the sender when "prompted by the ATM or other cash dispensing device in order to withdraw the transferred funds."
  - A. This would require special ATMs with screens, software, and special "prompts" to process the "UNIQUE SECURITY IDENTIFIER." Our process utilizes an ATM industry standard PIN.
  - B. This requires a second phone call between the sender and recipient to communicate the "UNIQUE SECURITY IDENTIFIER." Our process provides for a recipient with a pre-possessed magnetic stripe card with a pre-assigned PIN number, thereby implementing a much easier process and without possibility of the recipient not having access for a call back or, at the least, the inconvenience of same, or the lack of pen and paper - at possibly a pay phone - to record the "UNIQUE SECURITY IDENTIFIER."
  - C. The Cooper "CONFIGURED Computer Readable Medium" is for "ONE USE ONLY", whereas in our process, recipient cards can be used again.
13. 0089 Describes the recipient going to a THIRD PARTY COMMERCIAL VENDOR to pick up the "CONFIGURED Computer Readable Medium" with option to pick same up with an "agreed upon password."
1. Very different from our process which utilizes a pre-possessed magnetic stripe card with a pre-assigned PIN number, not a "CONFIGURED Computer Readable Medium." See 10. Above for additional discussion.

OBSERVATIONS: 11., 12., and 13. were apparently cited by the Examiner as being relative to our recipient magnetic stripe credit card, debit card, or the process's "Cash Card", but the Cooper process and medium do not describe same. Further, Cooper's "UNIQUE SECURITY IDENTIFIER" is not universally functional as is our PIN.

Cooper describes a proprietary NETWORK of special ATMs or other cash dispensing devices that will act upon the Cooper system's pay out order and a "CONFIGURED Computer Readable Medium" picked up by the recipient at a computer-decided location after initiation by the sender and sender's conveying of location and security pick up information to the recipient who then picks up the

"CONFIGURED Computer Readable Medium," a verification request by the recipient with security data and pay out by an ATM which can act upon Cooper's "CONFIGURED Computer Readable Medium" which is very different from our easier one call from sender process.

14. 0083-0094 Apparently cited by the Examiner for, in effect, being a prior art disclosure of our process relative to the transfer of cash to the recipient card and recipient's retrieval of the cash. In point of fact, the Cooper art and system is very different from our process as hereinbefore and hereinafter more specifically pointed out.
15. 0083 Cooper does use a toll-free number and a "standard" telephone (though not specifically a touch tone telephone) to transfer money to a receiver with a "CONFIGURED Computer Readable Medium" picked up at the third party vendor "NETWORK" and uses a "UNIQUE SECURITY IDENTIFIER" or an optional pick-up password.
  - A. Our invention's process is different and easier. Please see prior discussions.
16. 0084 Cooper requires determination of a location for recipient's pick up of their "CONFIGURED Computer Readable Medium." Our process provides for the recipient to already have possession of a magnetic stripe card previously acquired from a vendor or otherwise previously acquired.
17. 0085 Cooper requires a "UNIQUE SECURITY IDENTIFIER" which is not required by our easier and more efficient process.
18. 0086 Sender must contact the receiver to convey the "UNIQUE SECURITY IDENTIFIER" and the THIRD PARTY COMMERCIAL VENDOR "NETWORK" location for pick up of the "CONFIGURED Computer Readable Medium."
  - A. Our process is much different, easier and more efficient and does not require the sender to convey any information to the recipient. Please also see prior discussions.
19. 0086 Credit card transaction is verified by the Cooper transaction database.
  - A. Our process transfers the cash virtually simultaneously from the sender's credit or debit card account to a magnetic stripe card account.
20. 0087 Cooper transfers sender's information to its "VIRTUAL TRANSACTION FULFILLMENT CENTER."
  - A. Our process transfers the cash. Cooper's system can only work within their own NETWORK of ATMs which Network ATM or cash disbursement device will accept an order to dispense cash from Cooper's "VIRTUAL TRANSACTION FULFILLMENT CENTER."
21. 0088 Provides for cancellation and refund after preset amount of time.

- A. Our process provides for cancellation and refund upon request of the sender.
22. 0089 Recipient goes to third party commercial vendor and picks up the "CONFIGURED Computer Readable Medium" with the option of presenting a password.
- A. Not needed in our easier system. Please see prior discussions.
- B. The optional password would require a human to implement recording the password into the process and could not be accomplished with a fully-automated I.V.R. system as in our process. Furthermore, our process does not require pick up of the recipient's "Medium" after initiation of the process. Please see prior discussions.
23. 0090 Receiver must call a toll free number to verify receipt of the "CONFIGURED Computer Readable Medium."
- A. Not required by our easier process in which the recipient security is provided by pre-possession of the recipient's magnetic stripe card and PIN so that a call verifying receipt of a "Medium" is not required. In our process, the recipient need not communicate with the process.
24. 0090 The Cooper transaction control center then MERGES the sender's information with the "CONFIGURED Computer Readable Medium."
- A. Not required by our easier process which transfers cash rather than "MERGING" information within a Cooper NETWORK system.
25. 0091 The Cooper THIRD PARTY COMMERCIAL VENDOR may have a dedicated phone to perform step 0090.
- A. Not needed in our easier process since the recipient is in pre-possession of the magnetic stripe card, need not verify receipt of the "Medium" and need take no steps prior to ATM withdrawal and may utilize virtually any ATM.
26. 0092 The Cooper "TRANSACTION CONTROL CENTER" then sends an ACTIVATION SIGNAL to the "transaction database" which enables the "CONFIGURED Computer Readable Medium" to be used by a NETWORK of ATMs or other cash dispersion devices by MERGING the "CONFIGURED Computer Readable Medium" information with the transaction information.
- A. Very different from our process:
- 1) Cooper uses an ACTIVATION SIGNAL which can only be effective in the Cooper network of ATMs or Cooper "cash dispersion devices."
- a) Our process can utilize any ATM or POS device which utilizes common processing networks as, for example, VISA, MasterCard, Cirrus, STAR, or the like, already established processing networks which process magnetic stripe cards.
- b) Our process transfers the cash to an account accessible by the recipient's magnetic stripe card and PIN.

(1) Our recipient card was "active" before the transfer and does not require an "ACTIVATION SIGNAL."

27. 0093 The third party commercial vendor site will, ideally, have an ATM to facilitate the transfer.
- A. Not needed in our process since a third party commercial vendor is not needed and since virtually any ATM can be used to receive the transferred cash.
28. 0094 The recipient can now use the "CONFIGURED Computer Readable Medium" at an ATM to withdraw the cash transferred in the secure "WIRE TRANSFER."
- A. Cooper here clearly shows itself to be a "WIRE TRANSFER" as also stated in 0059 to be "A COMPUTER SYSTEM FOR ENABLING AN IMPROVED SECURE CONSUMER WIRE TRANSFER."
- B. Cooper, in effect, requires a wire transfer NETWORK of special ATMs which will accept their "CONFIGURED Computer Readable Medium," whereas our process can utilize any ATM with a common magnetic stripe card which does not need to be "CONFIGURED."
29. 0094 Cooper requires that: "The withdrawing consumer will need to use the 'UNIQUE SECURITY IDENTIFIER' communicated to him by the sender in order to withdraw the cash."
- A. Not needed in our easier process in which the recipient utilizes the pre-assigned PIN and does not need ANY information to be communicated to him or her by the sender.
30. 0094 Cooper's "CONFIGURED Computer Readable Medium" is for "ONE USE ONLY."
- A. The magnetic stripe cards used in our process are not limited to "ONE USE ONLY" and can be used multiple times.
- 1) Our process also provides for change of the PIN so that it can be used by successive different parties in a manner secure from fraudulent access by a prior user.
- a) Our process will, therefore, be less expensive and easier to implement for successive transfers since in our process the cards need not be replaced for later successive transfers.
31. 0101 Cooper provides that if the credit card transaction is valid, its database "INFORMS" the "TRANSACTION FULFILLMENT CENTER."
- A. In our process, the cash is transferred, whereas Cooper only "INFORMS" its own process and therefore can only be utilized for dispensation of cash within the NETWORK which is part of its own process.
32. 0102 Cooper optional process wherein the third party commercial vendor can inform the transaction control center that the recipient has not picked up the "CONFIGURED Computer



Readable Medium" and the Cooper system can "DEACTIVATE" the "CONFIGURED Computer Readable Medium."

- A. Not applicable to our system which does not utilize or need "ACTIVATION" or "DEACTIVATION" of the recipient's pre-possessed magnetic stripe card.

33. 0103 Cooper method for ACTIVATION of the "CONFIGURED Computer Readable Medium."

- A. Not applicable to our process which does not utilize or need "ACTIVATION" of the recipient's pre-possessed magnetic stripe card.

34. 0103 Cooper system which "MERGES" sender information with "appropriate" information from the "CONFIGURED Computer Readable Medium" and then informs a "PARTICIPATING FINANCIAL COMPUTER NETWORK" that the "CONFIGURED Computer Readable Medium" is ACTIVE, allowing the recipient to withdraw cash from the PARTICIPATING NETWORK.

- A. Cooper requires "PARTICIPATING...COMPUTER NETWORKS" which our process does not require. Our process utilizes a common magnetic stripe card and a common ATM, and does not require a "PARTICIPATING...COMPUTER NETWORK."
  - 1. Our process is easier, cheaper and provides much more accessibility to a recipient in pre-possession of a magnetic stripe card.

35. 0104 The Cooper process shown in Fig. 8A provides steps ultimately leading to "NOTIFY ATM NETWORKS."

- A. Not applicable to our process which actually transfers cash to an account accessible with a magnetic stripe card and DOES NOT REQUIRE NOTIFICATION of an ATM in the process's "PARTICIPATING NETWORK."

36. 0105 This Cooper complex algorithm determines if information matches relative to [sender] transaction, recipient information, assigned serial numbers for the "CONFIGURED Computer Readable Medium," "PICK UP LOCATION FOR SAME," AND a "SECURITY CODE."

- A. Not applicable to our process which actually transfers cash and does not require storage and matching of data. Our easier process processes all data virtually simultaneously and transfers the cash to the recipient's already in possession, magnetic stripe ATM accessible card account.

37. 0106 Cooper "MERGES" data and "INFORMS" "A" financial network that the "CONFIGURED Computer Readable Medium" is NOW ACTIVE or alternatively cancels the entire transaction.

- A. Again, our process effectuates a transfer of cash to the recipient's already in possession, magnetic stripe ATM accessible card account. Our system does not ACTIVATE a "CONFIGURED Computer Readable Medium," it TRANSFERS

CASH in one virtually simultaneous transaction.

38. 0107 Alternate "computer oriented" method for a portable electronic draft using a "CONFIGURED Computer Readable Medium" ("as an Alternative to Traditional Traveler's Checks") utilizing third party commercial vendor networks.
- A. Other than the words "computer oriented," this appears to briefly summarize limited aspects of the Cooper system which have been previously distinguished.
39. 0108 Cooper here describes a "ONE TIME USE ONLY" "CONFIGURED Computer Readable Medium," a "computer system," a "UNIQUE SECURITY IDENTIFIER" and a "NETWORK OF THIRD PARTY COMMERCIAL VENDORS" with an on-location ATM connected to a financial "COMPUTER NETWORK."
- A. Again, a brief summary of the Cooper invention, all aspects of which have been previously covered and which are very different from the subject invention's process in most all aspects, especially those above described in this Cooper claim.
40. 0109 Cooper again describes: "ONE TIME USE" "CONFIGURED Computer Readable Medium" which FUNCTION as ATM cards and in which may be included an optional "UNIQUE" account identifier.
- A. Very different from our process which utilizes a MULTIPLE-USE magnetic stripe ATM card and common PIN number and not a "UNIQUE" identifier requiring a "UNIQUE" reading and processing system.
41. 0110 Cooper describes utilizing a 1-800 number or a Web site.
- A. Many patented business process inventions utilize toll free telephones and/or Web sites for different purposes and different data transmittal.
- 1) Our invention should be granted a patent because of its unique algorithm or process, novel claims and novel process sequence resulting in a transfer to an account accessible from a "COMMON" ATM with a "COMMON" MAGNETIC STRIPE CARD.
42. 0110 Cooper also describes that the THIRD PARTY COMMERCIAL VENDOR may have a "TRANSACTION FULFILLMENT CENTER" on site or in a virtual location.
- A. Our easier process does not require a "TRANSACTION FULFILLMENT CENTER" since our system effects a single continuous process with virtually simultaneous transfer of cash.
43. 0111 The Cooper "TRANSACTION CONTROL CENTER" inquires and inputs information from the [sender] purchaser consumer such as amount and the "UNIQUE SECURITY IDENTIFIER."
- A. Our process inputs and processes a different information package. For example, our process does not input and does not require a "UNIQUE SECURITY

IDENTIFIER" as does Cooper. Our claims disclose a unique process with different elements and processes.

44. 0112 Cooper optional feature verifying serial number would serve no purpose in our invention's easier and more efficient process.
45. 0113 Cooper records purchaser information, such as credit card number, into its database, whereas our process simultaneously processes same to effectuate a virtually simultaneous transfer of cash from the credit card to a pre-existing magnetic stripe card account. In addition, our process will also process a transfer from a debit card.
46. 0114 Cooper's transaction control center sends VERIFICATION to the database which enables their "CONFIGURED Computer Readable Medium" to be used by a NETWORK of ATMs or other cash dispersion devices.
- A. Verifies transaction, thereby enabling use of their "CONFIGURED Computer Readable Medium" by THEIR NETWORK, whereas our process transfers cash simultaneously to an account accessible by a recipient's pre-possessed magnetic stripe credit card, debit card or the invention's Cash Card.
47. 0115 The [recipient] WILL NEED to use the "UNIQUE SECURITY IDENTIFIER" that THEY COMMUNICATED to the transaction control center.
- A. In our process, the recipient, himself or herself, does not need to convey any information to the process prior to actual withdrawal from an ATM.
48. 0115 The [recipient] is reminded that the [Cooper] process "CONFIGURED Computer Readable Medium" is "ONE USE ONLY."
- A. Our process does not prohibit multiple use, thereby providing convenience and lower cost to recipients and additional fees to the process provider.

CONCLUSION: Applicant respectfully submits that all business process patents granted, or in the future to be granted, input information, but are granted patents because of the elements gathered, the organization of information and its interrelationships and limitations; see IN RE LOWRY, 32 F.3d (Fed. Cir. 1994). Applicant further respectfully submits that Cooper does not contain all of the elements, processes, functions, uses, and results of the Applicant's cash transfer process. Applicant claims a process which is substantially different in construction, function, use and operation from Cooper and is, therefore, not anticipated by Cooper. Therefore, Applicant respectfully submits that the Section 102E Anticipation Rejection should be removed and that Applicant is entitled to be granted a patent.